



DEPARTMENT OF
COMMERCE
COMMUNITY AND
ECONOMIC DEVELOPMENT

Regulatory Commission of Alaska

Sarah Palin, Governor
Emil Notti, Commissioner
Anthony A. Price, Chairman

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

Telecommunications Relay Service Recertification Application
Submitted by the
Regulatory Commission of Alaska

The Regulatory Commission of Alaska appreciates the opportunity to apply for recertification of Alaska's Telecommunications Relay Service program pursuant to 47 C.F.R. § 64.605 and in response to Public Notice DA07-2761.

I. Background

Legal Authority

In June 1998, the Federal Communications Commission (FCC) granted our application for certification of the Telecommunications Relay Service (TRS) program in Alaska.¹ Our TRS program was certified again in 2003, until July 25, 2008.²

Alaska's TRS program also operates under state statutory authority. AS 42.05.296 requires the Commission to:

[a]dopt regulations to require telephone utilities to provide service to deaf, hard of hearing, and speech impaired subscribers that permits the subscriber to communicate by telephone with persons of normal hearing and that makes available reasonable access of all phases of public telephone service to deaf, hard of hearing, and speech impaired telephone subscribers. . . .

¹ FCC File No.: TRS-97-36

² FCC File No.: TRS-19-02. DA 03-1729 Released: May 19, 2003

RCA TRS Regulations

On September 15, 2000, the RCA adopted amended regulations governing the provision of TRS in Alaska.³ The regulations adopt the federal TRS standards and require a TRS applicant to demonstrate the ability to meet or exceed federal requirements concerning all operational, technical, and functional minimum standards for TRS specified in 47 C.F.R. § 64.604. In addition, the TRS provider is not certificated on a permanent basis. Instead, the TRS provider is certificated for a minimum of five years. After the initial five-year period, we have the option of selecting a new provider through a competitive application process or retaining the existing provider for another period of at least five years.

Alaska's TRS Provider

In 2001, we selected Communication Service for the Deaf⁴ d/b/a CSD, CSD of Alaska, Alaska Relay, and Alaska Relay Service (CSD) as Alaska's TRS provider effective January 1, 2002.⁵ This year, we continued CSD's authority to provide TRS service in Alaska until at least May 1, 2012.⁶

II. Federal Certification Requirements (47 C.F.R. §64.605(b))

Compliance with operational, technical, and functional standards.

47 C.F.R. §64.605(b)(i) requires states seeking certification to document "that the state meets or exceeds all operational, technical, and functional minimum standards

³ Those regulations became effective on February 23, 2001.

⁴ Formerly South Dakota Association of the Deaf, Inc., Docket U-07-82.

⁵ U-01-65(3) dated September 21, 2001.

⁶ Orders U-07-27(2) and U-07-27(3).

contained in Section 64.604.” The RCA’s regulations specifically require the state’s TRS provider to “meet or exceed federal requirements concerning all operational, technical, and functional minimum standards for TRS specified in 47 C.F.R. §64.604.”⁷ A matrix showing CSD’s compliance with each of the standards in 47 C.F.R. §64.604 is included with this filing as **Appendix A**. A more detailed narrative describing CSD’s compliance with these requirements is included with this filing as **Appendix B**.

Adequate procedures and remedies for enforcement.

47 C.F.R. §64.605(b)(ii) requires states seeking certification to document that “the state program makes available adequate procedures and remedies for enforcing the requirements of the state program, including that it makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints.” Our rules and Alaska statutes provide a number of ways to enforce compliance with the state’s TRS program requirements. First, as noted above, our selection process requires a TRS applicant to demonstrate that it has the ability to comply with all federal operational, technical, and functional standards.⁸ Second, a TRS provider must file a tariff, which is subject to our review and approval that incorporates the terms and conditions specified in its application. “The TRS provider shall serve in conformance with its tariff until service expires under the terms of the certificate or until the commission decides otherwise.”⁹ Third, our rules include monthly data filing requirements to ensure compliance with state

⁷ 3 AAC 51.020(e)(1)

⁸ 3 AAC 51.020(e)(1)

⁹ 3 AAC 51.030

and federal service quality requirements.¹⁰ Fourth, we can impose civil penalties for violations of its statutes, regulations, orders, or written requirements.¹¹ Fifth, we note that our TRS provider selection or reevaluation process will take place approximately every five years. The RCA can and will replace its existing provider if another applicant proves to be more qualified.¹² Sixth, we can modify, suspend, or revoke the certificate of a TRS provider for good cause.¹³ Finally, we have adequate procedures in place to handle any complaints regarding intrastate TRS service, including informal complaints,¹⁴ alternative dispute resolution for appeals of informal complaints¹⁵ and formal complaints.¹⁶ These RCA procedures are in addition to the complaint resolution procedures outlined in section 3.4 of CSD's intrastate TRS tariff.

In 47 C.F.R. 64.605(b)(ii), the FCC specifically requires states to document that the state program "makes available to TRS users informational materials on state and Commission complaint procedures sufficient for users to know the proper procedures for filing complaints." We have a web page that generally describes our complaint procedures as well as offering links to web pages that contain procedures for filing a complaint with the TRS provider, the RCA, and the FCC.¹⁷ Brochures containing the

¹⁰ 3 AAC 51.030

¹¹ AS 42.05.571

¹² 3 AAC 51.020(d)

¹³ AS 42.05.271

¹⁴ 3 AAC 48.120

¹⁵ 3 AAC 48.121

¹⁶ 3 AAC 48.130

¹⁷ <http://rca.alaska.gov/RCAWeb/ForConsumers/InformalComplaints.aspx>

same information are available upon request. CSD provides outreach and promotional materials describing intrastate and interstate complaint procedures.

Conflicts with federal law.

47 C.F.R. §64.605(b)(iii) states that where a state program exceeds the FCC's mandatory minimum standards, the state must establish that its program in no way conflicts with federal law. As described above, we have adopted, by reference, the FCC's own minimum operational, technical, and functional standards. As a result, there is no conflict between state and federal standards.

47 C.F.R. §64.605(d) states, in part, that a state's funding mechanism "shall be labeled in a manner that promote[s] national understanding of TRS and do[es] not offend the public." The FCC has previously approved funding for TRS service in Alaska through a surcharge on basic local exchange customers' bills, labeled the "Universal Access Surcharge." We are aware of no other potential conflicts with federal law.

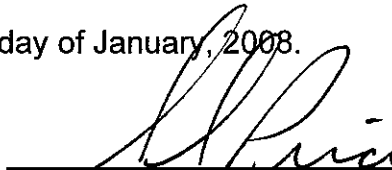
III. Appendices

The following appendices are attached to this application.

Appendix A *FCC TRS Mandatory Minimum Standards & Compliance Matrix.*

Appendix B *CSD Narrative regarding compliance with FCC operational, technical, and functional standards.*

Respectfully submitted this 7th day of January, 2008.



Anthony A. Price, Chair
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Appendix A

FCC TRS Mandatory Minimum Standards & Compliance Matrix

FCC Requirement		CSD Compliance
Operational Standards		
§ 64.604 A.1	Communications Assistant (CA) Competency Skills CAs are to be sufficiently trained to effectively meet the specialized communications needs of individuals with hearing and speech disabilities. CAs must be competent skills in typing, grammar, spelling, and interpretation of typewritten ASL, familiarity with hearing and speech disability cultures, languages, and etiquette. Typing Speed - 60 WPM with technological aids Oral-to-type tests VRS 'qualified' Interpreters	CSD requires that all CAs have a high school graduate equivalency as a minimum qualification for the job. All CAs are tested and evaluated to ensure Relay skills meet the FCC Guidelines. CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures and ASL translation. Each CA is required to take the 60 WPM typing test quarterly (four times a year). CSD administers Oral-to-type tests. CSD VRS interpreters are qualified interpreters that adhere to RID Code of Professional Conduct.
§ 64.604 A.2	Confidentiality & Conversation Context CAs are prohibited from disclosing the content of any relayed conversation regardless of content Certain exceptions are provided for Speech-to-Speech calls. CAs are prohibited from intentionally altering a relayed conversation and must relay all conversation verbatim unless specifically requested to do otherwise	CAs are trained and evaluated to ensure all aspects of confidentiality are maintained and conversational context is properly provided. CAs are prohibited from disclosing any call content. STS CAs are permitted to retain info from a call in order to facilitate the completion of consecutive subsequent calls. CAs relay calls verbatim and do not alter relayed conversation. CA's annually review the confidentiality and code of ethics with his/her team supervisor.
§ 64.604 A.3	Types of Calls CAs are prohibited from refusing single or sequential calls or limiting the length of calls utilizing relay services. TRS shall be capable of handling any type of call normally provided by common carriers.	CAs process all calls and never prohibit sequential calls or limit length of calls. CSD's TRS is capable of handling all call types normally provided by common carriers

§ 64.604 A.4

Handling of Emergency Calls

Providers must use a system for incoming emergency calls that, at a minimum, automatically and immediately transfers the caller to an appropriate PSAP.

Via E911 database, CSD automatically and immediately connects the caller to an appropriate PSAP.

A CA must pass along the caller's number to the PSAP when a caller disconnects before being connected to emergency services.

CAs pass along the caller's number to the PSAP when the caller disconnects prior to being connected to the emergency service.

§ 64.604 A.5

In-call Replacement of CAs

CAs answering and placing a TTY-based TRS or VRS call must stay with the call for a minimum of 10 minutes.

TRS and VRS CAs stay on the call for a minimum of 10 minutes.

STS CAs – 15 minutes.

STS CAs stay on the call for a minimum of 15 minutes.

§ 64.604 A.6

CA Gender Preferences

TRS providers must make best efforts to accommodate a TRS user's requested CA gender when a call is initiated and, if a transfer occurs, at the time the call is transferred to another CA.

CSD users are able to request the gender of the CA. CSD makes every effort to satisfy this request and to maintain the same gender during transfers.

§ 64.604 A.7

STS Called Numbers

STS users must be provided the option to maintain a list of names and phone numbers that the STS user calls. When the STS user requests one of these names, the CA must repeat it and state the phone number to the STS user.

CSD offers STS users the option of maintaining a list of names and phone numbers. When the STS user requests a name, the STS CA will repeat the name and the number to user.

This information must be transferred to any new provider.

CSD will provide the STS user information to any new provider.

Technical Standards

§ 64.604 B.1

ASCII & Baudot

TRS shall be capable of communicating with ASCII & Baudot format at any speed generally in use.

CSD TRS communicates with Baudot and ASCII in all speeds that are generally in use.

§ 64.604 B.2

Speed of Answer

TRS shall include adequate staffing to ensure 85% of all calls answered within 10 seconds by any method which results in the caller's call immediately being placed, not put in a queue or on hold.

CSD ensures that 85% of all calls are answered within 10 seconds and that caller's calls are immediately placed.

Abandoned calls shall be included in the speed-of-answer calculation.

Abandoned calls are included in the speed-of-answer calculation.

Speed of Answer is to be measured on a daily basis.

Speed of Answer is measured on a daily basis.

The system shall be designed to a P.01 standard.

CSD's system is designed to the P.01 standards.

§ 64.604 B.3

Equal Access to IXCs

TRS users shall have access to their chosen IXC carrier through the TRS and to all other operator services, to the same extent that such access is provided to voice users.

CSD provides users with access to their IXC carrier through the Carrier of Choice program allowing for the same access that is provided to voice users.

§ 64.604 B.4

TRS Facilities

TRS shall operate everyday, 24 hours a day.

CSD TRS is available 24 hours a day, everyday.

TRS shall have redundancy features functionally equivalent to the equipment in normal central offices, including uninterruptible power for emergency use.

CSD has redundancy features that provide functional equivalency, including uninterruptible power for emergency use.

Adequate network facilities shall be used in conjunction with TRS.

CSD's network facilities are sufficient to ensure that the probability of a busy response due to loop trunk congestion is functionally equivalent to what a voice caller would experience.

§ 64.604 B.5

Technology

No regulation set forth in this subpart is intended to discourage or impair the development of improved technology that fosters the availability of telecomm to people with disabilities.

CSD is committed to offering current technological features for TRS.

VCO & HCO technology are required to be standard features of TRS.

CSD provides VCO and HCO technology as standard features as well as several variations on these technologies.

§ 64.604 B.6

Voicemail & Interactive Menus

CAs must alert the TRS user to the presence of a recorded message & interactive menu thru a hot key on the CA's terminal.

CAs keep the user informed and notify of the presence of recorded messages and interactive menus. CA positions have hot key functionality that electronically capture recorded messages and retain them for the length of the call.

TRS providers shall electronically capture recorded messages & retain them for the length of the call, & may not impose any charges for additional calls that must be made by the user in order to complete calls involving recorded or interactive messages.

CSD does not charge for any additional calls necessary to complete call involving recorded or interactive menus.

TRS will handle pay-per-calls.

CSD processes pay-per-calls.

Functional Standards

§ 64.604 C.1

Consumer Complaint Logs

States must maintain a log of complaints including all complaints about TRS including the date the complaint was filed, the nature of the complaint, the date of resolution and an explanation of the resolution.

CSD and the State of Alaska maintain logs of all complaints. The logs include all of the required fields including the date, the nature, the date of resolution, and the explanation of resolution.

States & TRS providers shall submit to the FCC by July 1 of each year, summaries of logs indicating the number of complaints for the 12-month period ending May 31.

CSD provides summaries of the logs, which indicate the number of complaints received for a 12-month period ending May 31st.

CSD has submitted annual summary of

Consumer Complaints log report:

June 1, 2002-May 31, 2003

June 1, 2003-May 31, 2004

June 1, 2004-May 31, 2005

June 1, 2005-May 31, 2006

June 1, 2006-May 31, 2007

§ 64.604 C.2

Contact Persons

States must submit to the FCC a contact person or office for TRS consumer information and complaints about intrastate TRS.

CSD provides full support, including a primary point-of-contact, to contract administrators to meet FCC requirements.

§ 64.604 C.3

Public Access to Info

Carriers, through publication in their directories, periodic billing inserts, placement of TRS instructions, in phone directories, DA services, & incorporation of TTY numbers in phone directories, shall assure that callers are aware of all forms of TRS.

CSD follows all FCC requirements for public access to information and publishes in directories, brochures and billing inserts, instructions for TRS including 711 access in phone directories, DA services and the incorporation of TTY numbers in phone directories to assure that callers are aware of all forms of TRS.

Conduct ongoing education and outreach programs to publicize availability of 711 access.

CSD regularly provides 711 dialing information in its education and outreach programs.

§ 64.604 C.4

Rates

TRS users shall pay rates no greater than the rates paid for functionally equivalent voice communication services with respect to such factors as the duration of the call, the time of day, and the distance from the point of origination to the point of termination.

CSD TRS users pay rates no greater than the rates paid for functionally equivalent voice communication services.

§ 64.604 C.5

Jurisdictional Separation of Costs

(i) General, where appropriate, costs of providing TRS shall be separated in accordance with the jurisdictional separation procedures and standards set for in the Commission's regulations

(i) CSD follows FCC requirements in the jurisdictional separation of costs.

(ii) Cost recovery, Costs caused by interstate TRS shall be recovered from all subscribers for every interstate service, utilizing a shared-funding cost recovery mechanism

(ii) Interstate TRS is recovered from all subscribers for every interstate service utilizing the shared-funding cost recovery mechanism.

(iii) Telecommunications Relay Services Fund – To be administered by the National Exchange Carrier Association, Inc. (NECA)

(iii) CSD works with NECA for reimbursement of interstate minutes.

§ 64.604 C.6

Complaints

- (i) Referral of complaint,
- (ii) Intrastate complaint resolution,
- (iii) Jurisdiction of Commission,
- (iv) Interstate complaint resolution,
- (v) Complaint Procedures

The CSD TRS Customer Contact process is fully compliant with all FCC Requirements.

§ 64.604 C.7

Treatment of TRS Customer Info

Future contacts between the TRS administrator and the TRS vendor shall provide for the transfer of TRS customer profile data from the outgoing TRS vendor to the incoming TRS vendor. Such data must be disclosed in usable form at least 60 days prior to the provider's last day of service, and shall not be sold, distributed, shared or revealed in any other way by the relay provider or its employees, unless compelled to do so by lawful order.

CSD complies with this rule.

§ 64.605

State Certification

Per FCC's Public Notice on TRS State Re-certification released 5/1/02, the FCC requests an application be submitted through State's Office of the Governor or other delegated executive office empowered to provide TRS.

CSD assists the Regulatory Commission of Alaska with the re-certification process.

**Availability of
SS7
Technology
to TRS
Facilities**

Concluded that TRS providers should have access to SS7 or similar technology to make Caller ID and other benefits available and facilitate provision of TRS.

CSD supports Caller ID services.

Concluded that TRS providers are required to observe FCC's rules pertaining to Caller ID and call blocking services.

CSD complies with all FCC rules pertaining Caller ID and call blocking services.

**Transmittal
of Calling
Party
Information**

Concluded that when a TRS facility is able to transmit any identifying information to the network, the TRS facility must pass through, to the called party, the number of TRS facility, 711, or, if possible, the 10-digit number of the calling party. The identifying information passed through the TRS facility to the called party is to be determined by the TRS Provider.

CSD supports 10-digit dialing for local and toll calls.

CSD supports ID blocking indicators.

**Types of
Calls**

Concluded that the following call types are adopted as mandatory minimum standards of TRS.

CSD complies with this rule.

Two Line VCO
Two Line HCO
HCO-to-TTY
HCO-to-HCO
VCO-to-TTY
VCO-to-VCO

This requirement is waived for Internet Relay and Video Relay Services through December 31, 2007.

Handling of Emergency Calls	Required that all TRS facilities be able to pass emergency callers to the appropriate PSAP within twelve months of publication of this Order in the Federal Register (8/24/03). <i>This requirement has been waived for Internet Relay and Video Relay Services. (under separate Orders for SRO and VRS)</i>	CSD immediately connects emergency callers to an "appropriate" PSAP as defined by the FCC.
Answering Machine Message Retrieval	This feature allows a TTY user to retrieve voice messages left on his or her voice mailbox or voice answering machine by an incoming call from a third party. Concluded that the answering machine retrieval to be provided on interstate and intrastate basis by 8/24/03.	CSD complies with this rule.
Call Release	Call release allows a CA to set up a TTY-to-TTY call that once set up does not require the CA to relay the relay the conversation. Ruled that once the CA signs off, or be "released," after the two TTY parties are connected, at this point, the call ceases to be a TRS call subject to the per-minute reimbursement." This requirement is waived for Internet Relay and Video Relay Services.	CSD complies with this rule. Once a call is "released" from the CA workstation, the call is no longer a relay call and accordingly will not be charged to the state customer.
Speed Dialing	Speed dialing allows users to manually store a list of telephone numbers with designated speed dialing codes in the TRS user's consumer profile. This requirement is waived for Internet Relay and Video Relay Services.	CSD complies with this rule.
Three-way Calling	Three-way calling feature is generally arranged in one of two ways. 1. The TRS consumer may request that the CA set up the call with two other parties, or, 2. The second way is to set up a three-way call is for TRS user to connect to two telephone lines at the same time from his or her premises by using the telephone's switch hook (or "flash") button. This requirement is waived for Internet Relay and Video Relay Services.	CSD complies with this rule.

Appendix B

CSD Compliance with Operational, Technical, and Functional Minimum Standards for TRS¹⁸

OPERATIONAL STANDARDS¹⁹

COMMUNICATION ASSISTANT (CA)

CA EMPLOYMENT STANDARDS

CSD has established a successful procedure to attract qualified applicants for CA positions. The first step in the CA's hiring practice is a validated test that screens for typing, language skills, and other skills related to the CA position. When an applicant passes the test, a Human Resources representative screens the applicant over the phone or in person, for oral communication skills and work availability. If the applicant passes this step, he/she is interviewed in person by an Operations Supervisor for specific job dimensions that relate to the success of a CA. If the supervisor recommends the applicant for employment, the applicant undergoes a drug screen and security/reference check. This process ensures that only qualified applicants are hired to work at a relay center.

CA TRAINING PROGRAM

CSD trainers use adult learning theories; training is adapted to each participant's learning modality; incorporating lecture, visual graphics, flow charts, videos, role playing, and hands-on-call training, to stimulate the CA's ability to learn.

New hires receive training in Deaf Culture, ASL translation, Oral Deaf, and sensitivity to the needs of persons with hearing and speech disabilities by a qualified person who, if not deaf or hearing-impaired, possesses extensive knowledge in this area. During the CA's initial training, he/she is trained and evaluated on how to accurately reflect the TTY user's intent and on the CA's role in the relay process. CAs' performance based skills such as grammar; spelling and oral communication abilities are evaluated. CSD works closely with local deaf and hard of hearing communities to identify knowledgeable presenters to assist with the training. CSD utilizes videos, role-playing, group activities and discussion groups to educate employees on the different needs of their customers to ensure sensitivity towards customers.

Additionally, applicants are given four written and hands-on evaluations to demonstrate their ability to spell, type accurately and process a call using live training terminals and role-plays written in varying levels of ASL. CAs also receive extensive training on how to improve their interpersonal skills so that they can work effectively with difficult and stressful situations that may arise during their employment. These training mandates and skill expectations also apply to VRS interpreters where appropriate.

CAs utilize ASL Training workbooks for ongoing training. These workbooks have been designed to provide supplemental training and to assist CAs toward the mastery of ASL translation on relay calls.

¹⁸ 47 C.F.R. §64.604(a) – 47 C.F.R. §64.604 (c)

¹⁹ 47 C.F.R. §64.604(a)

Captioning Assistants Training Program

CapTel CA training includes comprehensive training on the CapTel Service Workstation equipment and other instruction including some live call handling experience. All prospective CAs are required to meet all of the CTI standards for becoming a production CA. These standards include the ability to consistently meet call handling skills such as WPM averages, accuracy averages as well as attendance and attitude standards as set by CapTel management. At any time if a prospective CA does not demonstrate the ability to achieve the expected standards, they may be removed from the training group and terminated employment.

All CapTel CAs are tested for competency in typing, grammar, and spelling to ensure skills meet the FCC Guidelines. CapTel CA training provides familiarity with hearing, deaf, and Speech-Disabled cultures. A captioned telephone user does not type while making a call, therefore there is never an opportunity for the CA to have to interpret typewritten ASL.

CapTel CAs must follow certain guidelines while supporting calls. Below is a list of these guidelines.

- The CA shall be trained to caption the words spoken by the hearing party as accurately as reasonably possible, without intervening in the communications. The CA is permitted to provide background noise identification.
- The CA shall not maintain any records of conversation content and shall keep the existence and content of all calls confidential.
- The CA shall be required to meet the FCC standards for TRS minimum transcription speed.
- The CA shall not limit the length of a call and shall stay with the call for a minimum of ten minutes when answering and placing a call.
- The CA shall pass along a CapTel caller's Automatic Number Identification ANI to the local Public Service Answering Point (PSAP) if the caller disconnects before being connected to emergency services.
- Personnel supporting CapTel will have the requisite experience, expertise, skills, knowledge and training and education to perform CapTel Services in a professional manner.

Video Relay Service (VRS) Training Outline and Qualifications

All VRS interpreters are qualified and will adhere to the Registry of Interpreters for the Deaf (RID) Code of Professional Conduct. The VRS interpreter qualifications are listed below:

- Certified by the NAD at levels III, IV, or V or certified by RID as IC/TC, CI, CSC, LSC or MSC or demonstrated State equivalent. (Note: In rare instances, Interpreters may process VRS calls prior to certification based on qualifications and interpreting skills).
- Possess English language skills at a college level.
- Observe strict confidentiality guidelines using RID's Code of Professional Conduct.

- Function in a totally transparent mode.
- Possess strong receptive and voicing skills.
- Possess sensitivity to the needs of the Deaf, Hard of Hearing and hearing parties.
- Have a wide range of experience working in the deaf Community utilizing ASL, PSE and Signed English Community utilizing ASL, PSE and Signed English communication modes in social, economic, and educational settings.
- Possess interpreting experience for persons who have minimal language skills.
- Possess computer literacy, including familiarity with current Windows operation system, and be able to operate computer and video equipment.
- Exhibit superior customer service skills.
- Possess the skill to conduct video interpretation sessions with a wide range of individuals.
- Have a good command of English grammar and composition.
- Possess clear and articulate voice communications.
- Be familiar with speech and disability cultures, languages, and etiquette.
- Possess the ability to work under pressure.
- Be capable of working in a multi-tasked environment.
- Have the skill to conduct telephone conversations with a wide range of individuals.
- Be a citizen of the U.S. or an alien who has been lawfully admitted for permanent residence as evidenced by the INS Permanent Resident Card (INS Form I-551).
- Successfully completed, as a minimum, training to include deaf culture, American Sign Language, sensitivity to the capabilities and needs of people with speech impairments, the VI's role in the relay process, and training in interpersonal skills to handle difficult or stressful conversations.
- Beginning college level skills in English grammar and diction.

TRANSMISSION OF 60-WPM

All CSD CAs type a minimum of 60-WPM. CSD utilizes an oral-to-type test that simulates actual working conditions. CAs are tested on an ongoing basis to ensure that a 60-word-per-minute performance requirement is maintained. During this test we do not use technology-aided transmission to ensure the typing speed. The scores for each CA are the actual words-per-minute (WPM) typed. The most recent test results exceeded 100 WPM and 97% accuracy.

CapTel's voice recognition technology transmits above 100 WPM. While oral to type tests are waived as a result of this technology, oral to text tests are given to all CapTel CAs.

CSD utilizes technological aides during relaying such as pre-programmed macros and auto-correcting software, along with the CA's natural skill, to provide optimal service.

QUALIFIED VRS INTERPRETERS

All VRS Interpreters are qualified and adhere to the Registry of Interpreters for the Deaf (RID) Code of Professional Conduct.

CA QUALITY ASSURANCE PROGRAMS

Individual Monthly Survey

Monthly surveys and formal reviews are used to monitor and evaluate the continuing training for our CAs. The survey process used is a product of a task force comprised of management staff. It evaluates all areas of work performance, personal effectiveness and attendance. The survey process goals are to respond to customer feedback and provide the CA with clearly defined and objective performance measures. Two surveys are completed on each CA every month and include areas such as Typing Accuracy, Spelling, Conversational English/ASL Translation, Clarity / Enunciation, Caller Control, and Etiquette/Composure.

Quality Assurance Test Calls

To ensure that all CAs are focused on FCC requirements and state contractual commitments, Supervisors from every center pair up to perform 10 scripted test calls each on an alternate centers for a total of 700 test calls. After each call, the supervisors fax the survey form to the appropriate center for the CA to receive immediate feedback. This feedback and appropriate guiding performance measures for specific components are addressed with each CA.

Account Management and Trainer Test Calls

Additionally, the Operations department and members of the Account Management Team identify areas of concern based on customer feedback, state feedback, individual survey results and customer contacts. Approximately 300 test calls per month are conducted focusing on the identified monthly call-processing topic. Results are compiled and shared with Operations' management. Based on the results, the trainers and management determine if refresher training is required and what method will be used for delivery.

CONFIDENTIALITY POLICIES AND PROCEDURES

CSD understands that measures to ensure confidentiality are crucial to the success of any TRS operation and has implemented procedural and environmental measures to safeguard customer and call information. In accordance with the FCC regulations, all information provided for call set up, including customer database and branding information, remains confidential and cannot be used for any other purposes. CSD also prohibits the use of any information obtained during the processing of a call. After the inbound party disconnects, CAs lose the ability to view or access any information pertaining to that call. No written or taped information regarding the call is kept after the call is released from the CA position. Billing information is transferred to billing files after the call has been terminated and is no longer available except for billing purposes.

No one is permitted to watch or listen to actual calls except CAs and supervisory staff for the purpose of relaying, assisting or monitoring the call or for training purposes.

CAs perform their work in cubicles that are bordered by high sound-absorption acoustic tiles and wear special noise reducing headsets. The cubicles are arranged to minimize the number of

cubicles that are side by side. The CA work areas have a security card key access and visitors are not allowed in CA work areas. These special equipment and environmental arrangements reduce noise interference and supports confidentiality.

All relay center personnel are required to sign and abide by a pledge of confidentiality that is a promise not to disclose the identity of any caller or any information learned during the course of relaying calls. Employees are expected to abide by the pledge of confidentiality during and after their period of employment. CSD's confidentiality policies are strictly enforced.

CSD strictly enforces confidentiality policies including the following:

Communication Assistant

- Prospective CAs are screened in the interview process on issues regarding ethics and confidentiality. During initial training, CAs are presented with examples of situations that could be considered breaches of confidentiality.
- Stress can be a factor in maintaining confidentiality. CAs receive training on healthy detachment. When CAs require counseling due to a stressful call, they do not discuss any specifics about the call. CSD contracts with professional agencies to provide our employees with the confidential assistance of professionally certified counselors.
- Breach of confidentiality will result in termination of an employee. All claims of breach of confidentiality are fully investigated. If the investigation confirms that any employee committed a breach of confidentiality, the employee will be terminated.
- When CAs require counseling due to a stressful call, they will not discuss specifics about the call. CSD has consulted with a medical agency to provide a confidential employee assistance program.

Building

- CA center has security key access.
- Visitors are not allowed in the CA work area.
- CA terminals screens are not visible from any window area.

CSD CAs relay everything that is said and everything that is heard. CAs do not omit or censor any aspect of the relay call. CAs convey all conversation, including profanity. All conversation during initial call set-up and acceptance of charges from the called party is relayed. All comments directed to either party by the CA are relayed and typed in parentheses.

VERBATIM RELAY AND THE TRANSLATION OF ASL

CAs type to the TTY user or verbalize to the non-TTY user exactly what is said, verbatim, when the call is first answered and at all times during the conversation, unless either user specifically requests summarization or ASL interpretation.

At the request of the relay user, CSD CAs will translate written ASL into conversational English. All CSD CAs are able to translate the typed languages of relay users whose primary language may be ASL or whose written English language skills are limited to conversational grammatically correct English. Training is provided on various levels of English/ASL during the initial training, as

well as throughout a CAs' employment. In order to finish training successfully, the CA must demonstrate competent skills to translate the calls as requested.

STS LIMITED EXCEPTION OF RETENTION OF INFORMATION

At the request of a caller, CSD STS CAs will retain information from a call in order to facilitate the completion of consecutive calls. No information is kept after the inbound call is released from the CA position.

STS FACILITATION OF COMMUNICATION

CSD STS CAs receive training on how to facilitate STS communication without interfering with the independence of the user. STS CAs are evaluated monthly on their ability to facilitate the call without altering content of the conversation or compromising the user's control. CSD relay users have full control of all of their relay calls.

Types of Calls

CSD provides 24 hour, 7 day-a-week TRS for standard (voice), Text Telephone (TTY), wireless, or personal computers (PC) users to place local, intrastate, interstate, and international calls. CSD also processes calls to directory assistance and to toll free numbers. There are no restrictions on the duration or number of calls placed by any relay user. All relay users accessing CSD retain full control of the length and number of calls placed anytime through relay.

CSD works in conjunction with the Local Exchange Enhanced Services to provide additional functionality for users of TRS. CSD processes collect and person-to-person calls and calls charged to a third-party as well as calls billed to prepaid and non-proprietary calling cards offered by the local or any other interexchange carrier. CSD will also process calls to or from restricted lines e.g. hotel rooms and pay telephones.

When a TRS call is placed through CSD, the user will be billed in the same manner that a non-relay user would be billed. The relay user will only be billed for conversation time, (which does not include call setup time, in between calls and wrap up time) on toll calls. Billing will occur within 60 days of the call date. CSD gives users the option of billing their calls to a non-proprietary LEC (local) or IXC (long distance) calling cards. CSD will process calling cards offered by the user's carrier of choice if the carrier as long as Feature Group D is at the Carrier's access tandem. CSD works with the LECs and IXCs to compile and make available to all TTY users a list of acceptable calling cards. The user's carrier of choice is responsible for providing call types and available billing options, and will also handle the rating and invoicing of toll calls placed through the relay.

Call Release Functionality

TTY to TTY Call Release Functionality allows the CA to connect two TTY users and then drop off the line, leaving the two TTY customers connected. This is especially useful for customers needing to use a pre-paid calling card, reach another TTY user through a switchboard or operator, or when needing to speak with a voice user first.

Frequently Dialed Numbers

Frequently Dialed Numbers, sometimes referred to as Speed Dial Numbers, allow relay users to store up to 10 frequently called numbers in their customer preference database along with a

name for each entry. When initiating a call the user can then provide the name to CSD CAs, instead of the entire 10-digit number.

Three-Way Calling

Customers who have purchased three-way calling from their LEC can use the feature when placing a call through Relay. This feature allows a customer to add a third party to a TRS call. For example, a TTY caller places a call to the Relay and then bridges another TTY person on his or her line. The original TTY caller then requests to place a call to a voice user. The CA will make the connection and Relay the call between the voice party and both TTY users. This process would also apply if there were two voice customers and one TTY user on the line.

CapTel users are also able to participate in a three-way call. Although the person using the captioned phone is unable to establish the three-way call, the called party will be able to do so by utilizing the telephone switch hook (or "flash") button on his or her CPE. Thus, CapTel meets the requirement for three-way calling for users of One-Line CapTel. For Two-Line CapTel, either party can initiate a three-way call should the user purchased this as a LEC option. CapTel users are also able to participate in a conference bridge to speak to three or more individuals.

HANDLING OF EMERGENCY CALLS

CSD's procedure for handling E911 calls fully complies with § 64.604 A.4.

IN-CALL REPLACEMENT OF CAs

CSD's policy and procedure for 10 and 15-minute rule on in-call replacement of CAs complies with § 64.604 A.5.

CA GENDER PREFERENCES

When a relay user requests a CA of the opposite gender to the CA who initially receives the call, the relay user is switched to an appropriate CA as soon as one becomes available. If a change of CA is necessary during the call, every attempt will be made to accommodate the previous gender request. When a VRS user requests a specific gender, every attempt will be made to honor the request. If a change is necessary during the call, every attempt will be made to accommodate the previous gender request.

CapTel CAs are waived from this requirement. See **Appendix A, FCC CapTel Mandatory Minimum Standards & Compliance Matrix**.

STS CALLED NUMBERS

CSD's relay customer database is available to STS users. The database can be used to store a list of names, frequently dialed telephone numbers, and customer notes. The database automatically appears on the CA's terminal screen each time a user dials into one of the CSD relay numbers. The customer database helps to facilitate call set up and conversing preferences for the STS user. Customer profile information contained in the CSD Customer Database will be transferred to any new provider at the end of the contract term.

TECHNICAL STANDARDS²⁰

ASCII & BAUDOT

Each CSD CA position is capable of receiving and transmitting in voice, Baudot including TurboCode™ and E-TurboCode™ as well as ASCII codes. Upon a call being received at the CA position, TTY signals are automatically identified as either Baudot or ASCII; if ASCII, the baud rate is detected. Intelligent modems allow the CA to handle either voice or data lines from the same CA work station.

This automatic identification of call types for incoming calls provides a quick and efficient technique for varied customer input and reduces the average CA work time to a minimum.

ASCII rates up to and including 19,200 bps are supported by our platform. The domestic TTY baud rate of 45.5 and the international rate of 50 baud are also supported.

SPEED OF ANSWER

CSD's Quality Assurance Program on Speed of Answer fully complies with § 64.604 B.2.

EQUAL ACCESS TO INTEREXCHANGE CARRIERS

CSD provides Alaska callers with the ability to have their intrastate, interstate and international calls carried by any Interexchange carrier who has agreed to participate in the Alaska Carrier of Choice (COC) program. When a caller indicates their COC preference, the CA will verify that the requested carrier is a COC participant, if they are, the call will be routed accordingly. Callers will be able to use any billing method made available by the requested carrier including collect, third party, prepaid and calling cards.

The current participating members of CSD *Carrier of Choice* program are:

Entity	CIC Code
▪ AT&T Communications	0288
▪ Bell South Long Distance	0377
▪ Bestline	0302
▪ Birch Telecom	0678
▪ Broadwing Communications	0948
▪ Broadwing Telecommunications	0071
▪ Cox Communications	6269
▪ Excel Telecommunications, Inc.	0752
▪ Global Crossings Telecommunications	0444
▪ MCIWorldCom	0222
▪ McLeod USA	0725
▪ Qwest Communications	0432
▪ SBC Communications Long Distance	5792
▪ Souris River Telecommunications	0770
▪ Sprint	0333
▪ Telecomm*USA (MCIWorldCom)	0220, 0321, 0835, 0987
▪ Touch America Services, Inc.	0244

²⁰ 47 C.F.R. §64.604(b)

▪ U.S. Link	0355
▪ VarTec dba Clear Choice Communications	0636
▪ VarTec Telecom, Inc.	0465, 0638, 0811, 0899, 5111
▪ Verizon Long Distance	5483
▪ Winstar	0643
▪ Working Assets	0649
▪ WorldCom	0555, 0987
▪ WorldXChange	0502, 0834

If an Alaska caller does not indicate a COC preference to the CA either on-line or in their customer database (or if their preferred carrier is not a COC participant), the call will be carried over the CSD network. As with calls carried by CSD, most COC participants limit billing methods based on the type of line from which the call originates. When the requested carrier is not a COC participant, CSD has established a procedure where the carrier will be notified, verbally and in writing, of its obligation to provide access to TRS users and encourage their participation.

TRS FACILITIES

CSD TRS Customer Service is available 24-hours a day, every day of the year. CSD utilizes both UPS and backup power generators to ensure that the relay centers have uninterrupted power even in the event of a power outage. UPS is used only long enough for the backup power generators to come on line – a matter of minutes. The backup power generators are supplied with sufficient fuel to maintain operations for at least 24-hours. The generators can stay in service for longer periods of time as long as fuel is available.

In the event of a power outage, the UPS and backup power generator ensure seamless power transition until normal power is restored. While this transition is in progress, power to all of the basic equipment and facilities essential to the center's operation is maintained. This includes:

- Switch system and peripherals
- Switch room environmentals
- CA positions (consoles/terminals and emergency lights)
- Emergency lights (self-contained batteries)
- System alarms
- CDR recording

As a safety precaution (in case of a fire during a power failure), the fire suppression system is not electrically powered. Once the back-up generator is on line, stable power is established and maintained to all TRS system equipment and facility environmental control until commercial power is restored.

TECHNOLOGY

Voice Carry Over

CSD has provided voice and hearing carryover as standard TRS features longer than any other provider. Voice carryover (VCO) allows a user to speak directly to the person he/she is calling

and receive responses by text through the CA (and vice-versa). In addition, CSD supports VCO-VCO, VCO-HCO, VCO-TTY, and Two Line VCO calls.

Hearing Carry Over

Hearing carryover (HCO) allows a person to listen directly to the person they are calling and provide their responses by text through the CA (and vice-versa). CSD was the very first relay provider to offer HCO users what is known as voice progression technology. This advancement eliminates the HCO users' need for reading macros and allows him/her to hear the call set-up, ringing and the called party answering the telephone. In addition, CSD supports HCO-HCO, HCO-VCO, HCO-TTY, and Two Line HCO calls.

Internet Relay

CSD provides a web-enabled, multi-language product – Sprint Internet Relay. Sprint Internet Relay calls can take place anywhere there is an Internet connection. This feature provides a secure and interactive relay experience using intuitive features designed for TRS users.

Video Relay Service

CSD meets all minimum technological standards regarding Video Relay Service.

Future Technology under Development

CSD is currently investigating future communication enhancements including, Caption Telephone, Real-Time Captioning service for conference calling, Speech to Text technology, Wireless Internet Relay through cell phone devices, wireless Video Relay accessibility, Palm Pilot and Two-Way Pager utilization through relay.

VOICE MAIL & 900 NUMBERS

When the CSD relay caller reaches an answering machine, voice mail or interactive menu, the CA informs the relay caller by hitting a macro, which reads (ANS MACH) or (RECORDING) to keep the caller informed of the call progress. The CA then, if necessary, presses a hot key to record the voice announcement and relay the message back to the caller. The CA utilizes CSD's recording technology to obtain all information necessary on the first attempt. The CA relays all of the recorded information to the customer and deletes the recorded message.

This technology greatly reduces the CA work time, as the CA does not need to make multiple outdials. In addition, CSD relay callers are only charged for the first call. Subsequent redials to leave a message or enter information into an interactive menu are not charged to the customers. CSD has developed a procedure using our Ultra WATS lines to ensure that with additional outdials the customer does not incur toll charges.

CAs have the capability to retrieve messages from answering machines by placing an outbound call to a remote location or the same location. When a user requests to retrieve messages at the same location, the CA will instruct the user when to take the handset off the hook and when to begin playing back the messages. The CA will retrieve all messages and relay verbatim. The recorded message will be automatically deleted by the system once the relay call is completed. The CapTel user both hears and interacts directly with the recorded message and makes the selections as requested by the interactive menu. The CapTel user is alerted to the presence of a recording by hearing the recording and seeing the captions of the recording as the message is played.

CapTel users can replay messages as required until the message is both heard and read as captions. The user can stay on the line as long as desired until the message is heard in its entirety or replayed. This is requested by the user directly. The CapTel user interacts with the recorded message system directly.

Callers to CSD relay services access 900 services by dialing a free 900 number to access relay. Use of a toll-free 900 number inbound to the relay center provides functionally equivalent access to the telecommunications network while preventing unauthorized end users from circumnavigating the LEC restrictions. This process ensures that the LEC will only complete those calls into the relay service that do not have a 900 number block added to their phone lines. The 900 service provider and the 900 number carrier will rate and bill the user as if the call was dialed directly from the originating user's telephone. CSD's 900 number is 900 230-2121.

FUNCTIONAL STANDARDS²¹

CONSUMER COMPLAINT LOGS

CSD provides copies of each TRS Customer Contact form, which includes the date the complaint was filed, an explanation of the complaint, the date the complaint was resolved and explanation of the resolution and any other pertinent information to Alaska. Further, CSD maintains a log of each individual complaint and provides comprehensive reports on a monthly and annual basis to each of the CSD States.

By June 25th of each calendar year, CSD submits a copy of 12-month complaint log report for the period of June 1- May 31, as well as a summary of the complaint log.

CONTACT PERSONS

The Regulatory Commission of Alaska's Consumer Protection Section is the office for filing intrastate consumer complaints.

Regulatory Commission of Alaska
Consumer Protection Section
701 West Eighth Avenue, Suite 300
Anchorage, Alaska 99501
Phone: (907) 276-6222
TTY: (907) 276-4533
Fax: (907) 276-0160
Consumer Hot Line: (toll free in Alaska): (800) 390-2782

PUBLIC ACCESS TO INFO

In Alaska CSD is responsible for "solicit[ing] input from users of the service and carriers whose customers use TRS" (3 AAC 51.020(e)(2)(A)) and for develop[ing] and implement[ing] community outreach and education services and programs" (3 AAC 51.020(e)(2)(C)). The Outreach Program is administered locally by a full-time staffperson who meets with community, user, and business groups. CSD also has an Advisory Board with statewide representation from around the state. CSD also has a Telephone Outreach Program that targets businesses for TRS education. Information on how to contact the TRS provider is included in state telephone directories. Finally, CSD maintains a web page for Alaska at www.alaskarelay.com.

²¹ 47 C.F.R. §64.604(c)

RATES

Alaska users are charged no more for services than for those charges paid by standard "voice" telephone users. The caller will only be billed for conversation time. Those users who select a preferred interstate carrier via the Alaska COC list, will be rated and invoiced by the selected interstate carrier.

JURISDICTIONAL SEPARATION OF COSTS

All Alaska Relay intrastate and interstate minutes are reported separately and distinctly to the state. The interstate and international minutes are reimbursed by the TRS Interstate Fund. The local and intrastate minutes are reimbursed by the State.

COMPLAINTS

CSD has a comprehensive Customer Complaint Tracking program. A supervisor or Operations Administrator is available 24-hours a day to accept complaints, document and forward documentation to the proper source for resolution. Supervisors provide immediate feedback to both the customer and the CA.

CSD will provide copies of each TRS Customer Contact form, which includes the date the complaint was filed, an explanation of the complaint, the date the complaint was resolved and explanation of the resolution and any other pertinent information to Alaska. Further, CSD maintains a log of each individual complaint and provides comprehensive reports on a monthly and annual basis to each of the CSD States.

The complaint resolution procedure outlines the steps to ensure complaints are resolved within 180-days of filing. If the complaint concerns a specific CA, an Operations Supervisor follows up and resolves the complaint. The role of the supervisor is to:

- Accept all types of complaints, issues and comments.
- Handle all service type complaints.
- Resolve complaints with Communication Assistants.
- Follow up with customers if requested by the customers.

If the complaint concerns a specific technical issue, a trouble ticket is filed and the ticket number is documented on the customer contact form. The ticket will be investigated and resolved by an on-site technician. The Account Manager is responsible for tracking all technical complaints and following-up with customers on resolutions.

If a miscellaneous complaint is filed with customer service, a copy is faxed to the Account Manager for resolution and follow-up with the customer.

Alaska customers also have the option of calling our 24-hour Customer Service department (1-800-676-3777) or the Alaska Outreach Manager to file complaints or commendations.

CSD has the capability to transfer the caller on-line to Customer Service department. A Customer Service representative will always answer the calls live. The Account Manager is responsible for tracking all commendations and complaints and sending copies of Customer Contacts to the State Relay Administrator by the invoice due date of the following month.

TREATMENT OF TRS CUSTOMER INFO

The CSD customer database includes such items such as types of call, billing information, speed dialing, slow typing, carrier of choice, as well as emergency numbers, blocked outbound numbers, language type (English, Spanish, ASL) and call notes are included in the customer profile. At the end of the ensuing contract(s) CSD will transfer all Alaska database records to the next incoming relay provider, at least 60-days prior to the last day of service, in a usable format.

CSD DIRECTORY EXAMPLES

ACS OF ANCHORAGE DIRECTORY 2007-2008

ALASKA RELAY

TELECOMMUNICATIONS RELAY SERVICE

*Connecting deaf, hard of hearing, speech-disabled and
hearing people*

DIAL 7-1-1 TO PLACE A RELAY CALL

or

(800) 770-8973 (TTY)

(800) 770-8255 (Voice)

(800) 770-3919 (ASCII)

(866) 355-6198 (Speech to Speech)

(866) 355-6199 (Spanish)

Alaska Relay:

Alaska Relay service provides telephone accessibility to people who are deaf, hard-of-hearing or speech disabled. Alaska Relay is available 24 hours a day, 365 days a year, with no restrictions on the number of calls placed or the length of the calls. Alaska Relay provides state-of-the-art technology, a full range of features, and highly trained, professional communication assistants (CAs) to ensure that users are able to communicate easily and effectively – every time they place a relay call. This 24-hour relay service is provided at no cost to callers. Long distance calls will be billed accordingly.

Confidentiality and Ethics:

Alaska Relay is strictly confidential. All calls will be kept private, and no records of any conversations will be maintained. CAs will not share information regarding the content of any relay calls. All calls and information are 100 percent confidential.

For more information – Check our web site at:
www.AlaskaRelay.com

**ALEUTIANS/NORTHWEST CENTRAL ALASKA DIRECTORY
2007-2008**

RELAYalaska

Telecommunications Relay Service

RELAYalaska allows Text Telephone* (TT) users and voice phone users to communicate with each other through specially-trained Communications Assistants (CA). These assistants verbally relay typed messages from *TT users to voice phone users and type oral messages from voice phone users to *TT users.

RELAYalaska operates 24 hours a day, 365 days a year and is completely confidential. You can use the service for both local and long distance calling (no 900 number calls) at no additional charge.

To reach RELAYalaska from a *TT, dial:

1 + 800-770-TYPE

(1 + 800-770-8973)

To reach RELAYalaska from a voice phone, dial:

1 + 800-770-TALK

(1 + 800-770-8255)

The CA will ask for all necessary calling information and then begin relaying your call.

There is no time limit or limit on the number of calls you can make through RELAYalaska. For

more information on RELAYalaska or for information on how you can obtain a *TT through this service, call

1 + 800-770-6770 (V/TT) or

1 + 800-770-2234 (V/TT).